

REMARKS

In view of the above amendments and following remarks, reconsideration and further examination are requested.

Initially, it is respectfully submitted that the finality of the Office Action mailed August 13, 2007, is premature, because the new ground of rejection provided in that Office Action was not necessitated by any amendment to the claims, but rather resulted from Applicants' submission of the English language translation of the priority document. Indeed, though claims 1-43 were canceled and claims 44-82 were added in the Response filed January 26, 2007, claims 44-82 recited the subject matter of former claims 1-4, 7, 5, 6 and 8-39, respectively, albeit in a slightly different form. Thus, the subject matter of claims 44-53 was already considered by the Examiner, and no new subject matter was added by these claims. Thus, it is respectfully submitted that the finality of the August 13th Office Action should be withdrawn.

Claims 44-82 have been canceled, and claims 83-98 have been added.

In the August 13th Office Action: claims 44-48 and 50 were rejected under 35 U.S.C. § 102(b) as being anticipated by Yokota; claim 49 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Yokota in view of Izumi, et al.; claims 51-52 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Yokota et al. in view of Ishihara; and claim 53 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Yokota et al. in view of Yip. These rejections are respectfully traversed, and the relied-upon references are not applicable with regard to newly added claims 83-98 for the following reasons.

The instant invention pertains to an image writing apparatus, wherein light from light emitting elements is to be irradiated onto a photosensitive drum. The light emitting elements are positioned on a substrate, and are to emit light in an advancing direction. The advancing direction of the light is changed by converting structure so as to be parallel to the substrate. To avoid cross talk between light emitted from respective light emitting elements, associated with each light emitting element is a corresponding light converting structure (claims 83 and 88). Alternatively, when there is converting structure that is common to the light emitting elements

(claim 91), the light transmitting structure functions to prevent crosstalk between the light emitted from the light emitting elements.

To the contrary, the primary reference to Yokota et al. discloses a light source of an image reading apparatus. In Yokota et al., light from the light source should be reflected with uniform intensity onto a sheet document. That is, the light from the light source should be reflected internally of light guide 11 with irregular reflection as shown in Fig. 9A, and the light reflected from a specific surface of the light guide 11 should irradiate a symmetric surface with uniform intensity. The light from the light guide 11 irradiates the sheet document, and then reflected light is received by rod lens array 12. The rod lens array guides the light to a light sensor.

Thus, the light source of the instant invention differs from that of Yokota et al. in that the light source of the instant invention is to be used with an image writing apparatus, whereas the light source of Yokota et al. is used with an image reading apparatus. Due to structural difference between an image writing apparatus and an image reading apparatus, a conception of pixels is different in each of these apparatus. Specifically, with the instant invention light emitted from each light emitting element arrives at the photosensitive drum without intersecting light emitted from any other of the light emitting elements. To the contrary, Yokota et al. requires that an irradiation surface on an object surface (document surface) is a long slender stripe surface with uniform intensity (like a line), and thereby light emitted from the light emitting element thereof should be diffused on the light irradiation surface. Accordingly, were plural light sources employed in Yokota et al., the light emitted from each of these light sources should intersect with each other, and have uniform intensity. This is not a conception of pixels (i.e. light is a beam with a specific diameter). Thus, the light source of Yokota et al. is not applicable for use as a light source of an image writing apparatus.

With specific reference to the claims, in addition to each of independent claims 83, 88, 91 and 96, reciting that the light source is for an **image writing apparatus**, these claims also recite that the converting structure(s) is to convert an advancing direction of light emitted from the light emitting elements so as to be parallel to a substrate. The significance of converting the advancing direction of the light in such a manner is that this allows for the light source to be

thinner. Though the Examiner has expressed that the light guide 11 in Yokota et al. converts an advancing direction of light into a direction that is parallel to a substrate, it is not seen where Yokota et al. teaches or suggests conversion of an advancing direction of light into a direction that is parallel to a substrate. Indeed, it is unclear as to what structure the Examiner has equated to the substrate.

In view of the above, none of claims 83, 88, 91 and 96 are anticipated by Yokota et al., whereby claims 83-98 are allowable over Yokota et al. In the event that the Examiner continues to rely on Yokota et al. to reject the claims, then the Examiner is requested to specifically identify how each of the claim limitations is being read on this reference.

Izumi et al. does not remedy any of the above deficiencies of Yokota et al. Additionally, though Izumi et al. discloses use of a prism to change direction of light, there is nothing in Izumi et al. or Yokota et al. to indicate that a prism could be substituted for the light guide 11 of Yokota et al. while allowing the image reading device of Yokota et al. to operate as intended.

Accordingly, one having ordinary skill the art would not have found it obvious to substitute the prism of Izumi et al. for the light guide of Yokota et al. Thus, none of claims 83, 88, 91 and 96 are obvious over a combination of the teachings of Yokota et al. and Izumi et al., whereby claims 83-98 are allowable over any possible combination of these references.


Neither Ishihara nor Yip resolve any of the above deficiencies of Yokota et al. and Izumi et al., whereby claims 83-98 are allowable over the relied-upon references either taken alone or in combination.

In view of the above amendments and remarks, it is respectfully submitted that the present application is in condition for allowance and an early Notice of Allowance is earnestly solicited.

If after reviewing this Amendment, the Examiner believes that any issues remain which must be resolved before the application can be passed to issue, the Examiner is invited to contact the Applicants' undersigned representative by telephone to resolve such issues.

Respectfully submitted,

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